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June 5, 2024

**VIA ECF**

Honorable Eric Komitee  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East – Courtroom 6G North  
Brooklyn NY 11201

**Re:    *Hirsch v. Beda et al.***  
**22-05011 (EK/VMS)**

Dear Judge Komitee:

On behalf of Defendants Nourite Maimon and Sari Dana, I write to respectfully urge the Court to reject the June 2, 2024, letter application by the Plaintiff for an "order to bar the defendants in this case from publicly discussing this matter".

Tellingly, Plaintiff's letter cites absolutely no facts or legal support for the over-broad First Amendment infringement he seeks. This is not surprising given the nature of his claims in this matter - which should be dismissed. That aside, there is simply no basis for the Court to enter the order requested.

Finally, as a matter of procedure, an application such as this should not even be considered upon the submission of a letter. Rather, if the Plaintiff believes the order he requests is justified by good cause, he should file a motion with both the factual and legal support necessary to grant the extraordinary relief he seeks. Because he will not be able to do so, we respectfully request that costs be imposed for filing a frivolous and unsupported motion in this regard.

Respectfully submitted,  
/s/Moshe Maimon  
Moshe Maimon